

AO 91 (Rev. 01/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Lakia S. Jackson

Defendant

Case No.

2:11-mj-149

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of \_\_\_\_\_ in the county of Franklin in the Southern District of Ohio, the defendant violated 21 U. S. C. § 856 (a)(2), an offense described as follows:

Knowingly manage or control any building for the purpose of unlawfully storing, or distributing cocaine

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

  
Complainant's signature

Special Agent Janey Carroll

Printed name and title

Sworn to before me and signed in my presence.

Date:

2/24/2011

  
Judge's signature

City and state:

Columbus, Ohio

US Magistrate Judge Elizabeth Deavers

Printed name and title

**AFFIDAVIT**

Janey Carroll, being first duly sworn, states the following:

1. Your affiant is a sworn Special Agent with the United States Drug Enforcement Administration (DEA), Columbus District Office. Your affiant is an investigative or law enforcement officer of the United States within the meaning of Section 2510 (7) of Title 18, United States Code, in that your affiant is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

2. Your affiant has been a Special Agent with DEA since March of 1999. Your affiant has been assigned to the DEA Columbus District Office, where your Affiant has been involved with narcotics investigations. In addition DEA Basic training Academy in Quantico, Virginia, your affiant has attended various narcotics investigative training courses, which were instructed by DEA or other law enforcement agencies.

3. Your affiant has participated in numerous investigations relating to the manufacture and distribution of drug trafficking activity. Your affiant, during the course of her law enforcement career, has had experience in debriefing defendants, interviewing participating witnesses, cooperating individuals and other persons who have personal knowledge and experience regarding the amassing, spending, conversion, transportation, distribution, concealment of records and proceeds of trafficking in controlled substances. Your affiant has also participated in numerous investigations utilizing pen registers and Title 3 intercepts as investigative tools.

## **INVESTIGATIVE BACKGROUND**

4. This affidavit is being submitted in support of an application for a criminal complaint against **Lakia S. JACKSON**. Your affiant has probable cause to believe that, in or about March 2010, in the Southern District of Ohio, **Lakia S. JACKSON** did manage or control any place, whether permanently or temporarily, that is, a residence located at 6336 Royal Tern Crossing, Gahanna, Ohio (**hereafter referred to as the Royal Turn Address**), either as an owner or occupant, and did knowingly and intentionally make available for use, with or without compensation, said place for the purpose of unlawfully storing and distributing cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 856(a) (2). Your affiant has set forth only those facts that your Affiant believes are necessary to establish probable cause to arrest **Lakia S. JACKSON** (**hereafter referred to as JACKSON**).

5. Your affiant has spoken with investigating detectives with the Franklin County Sheriff's Office, other investigative officers, and agents of the DEA Columbus DO, involved in this investigation. Your affiant has reviewed reports, and learned, in substance, the following: on March 10, 2010, members of the DEA Columbus District Office and The Franklin County Sheriff's Office executed a State of Ohio search warrant at the **Royal Turn Address**, the residence of Sheron Sanchez Phipps (hereafter referred to as Phipps). Phipps is the subject of a long term narcotic investigation. At the search warrant agents and investigating officers confiscated and seized items including but not limited to: cocaine in the amount of 13.6 grams, a Smith and Wesson .40 caliber firearm, a

Smith and Wesson 9mm firearm, a Cobra .380 caliber firearm, ammunition, US currency totaling \$12,155.00, a cocaine press, two large metal containers of Acetone, a large container of Inositol, one hundred and one (101) unit doses of Oxycodone, digital scales and miscellaneous drug paraphernalia. **JACKSON**, the lessee of the apartment and girlfriend of Phipps, was present at the time of entry, and agreed to be interviewed by agents on the scene. **JACKSON**, was mirandized by TFA Annie Durbin and **JACKSON** waived her constitutional rights.

6. **JACKSON** told TFA Durbin she has been dating PHIPPS, for about the last two and a half years. In early 2008, six months into dating PHIPPS, **JACKSON** was pregnant by PHIPPS. **JACKSON** stated that she, PHIPPS, and the two children have lived at this residence of **Royal Turn Address** since March of 2009. This was verified by the lease agreement obtained from the rental office of Preserve Crossing. The lease agreement clearly indicates that **JACKSON** was the sole lessor for the address of the **Royal Turn Address**, with the only additional occupants being her two infant children. **JACKSON** stated each month she paid half the rent while PHIPPS paid the other half of the rent for 6336 Royal Tern Crossing.

7. **JACKSON** stated since meeting and living with PHIPPS, **JACKSON** is unaware of any meaningful employment obtained by PHIPPS. TFA Durbin had already confirmed this by verifying through a subpoena to the Ohio Department of Taxation, that as of December 30, 2009, PHIPPS has not filed taxes from April 2006 through April 2008. **JACKSON** told detectives PHIPPS only source of income had been through narcotic trafficking. **JACKSON** wrote a statement at

the scene verifying that the firearms, (with the exception of a pink .380 caliber), cocaine, and US currency recovered during the search warrant solely belonged to PHIPPS. **JACKSON** stated at one point she has counted \$7,000.00 dollars from PHIPPS drug proceeds.

8. Agents on the scene recovered a large sum of bundled money from a pillowcase on the bed shared by PHIPPS and **JACKSON**. **JACKSON** stated to TFA Durbin, the bindle increments in the bundle should be banded in \$1,000.00 dollars each. **JACKSON** stated that the money recovered from the pillow case were proceeds from PHIPPS drug trafficking.

8. Furthermore, **JACKSON** told TFA Durbin that when PHIPPS conducts drug trafficking activities at their residence, PHIPPS makes **JACKSON** retreat to and remain at other levels of the residence of **Royal Turn Address**. **JACKSON** explained this behavior is because PHIPPS trust no one. **JACKSON** then explained to agents that previously they (PHIPPS AND **JACKSON**) have been robbed at gun point. **JACKSON** also mentioned that PHIPPS believed a prior live in girlfriend Brandy CLAYTOR , the mother of his other child, had set him up to be robbed at their residence of 443 Streamwater Blacklick, Ohio. Investigating officers were familiar with this incident and a police report for burglary was filed. Along with this report was an officers' written summary concerning the incident and statements by Brandy CLAYTOR in reference to PHIPPS narcotic trafficking.

**CONCLUSION**

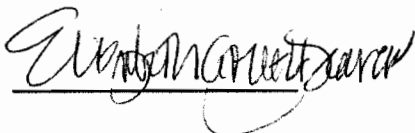
9. Based on information contained in this affidavit, there is probable cause to believe that in or about from March 2010, in the Southern District of Ohio, **Lakia S. JACKSON** did manage or control any place, whether permanently or temporarily, that is, a residence located at 6336 Royal Tern Crossing., Gahanna, Ohio, either as an owner or occupant, and did knowingly and intentionally make available for use, with or without compensation, said place for the purpose of unlawfully storing and distributing cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 856(a) (2).



Janey Carroll  
Special Agent  
Drug Enforcement Administration

Subscribed and Sworn to before me

this 24<sup>th</sup> day of February, 2011



Elizabeth Deavers  
U.S. Magistrate Judge  
Southern District of Ohio